

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

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<b>JOHN DOE</b>	:	
	:	
Plaintiff,	:	
v.	:	No. 2:25-cv-01691-WB
	:	
<b>AMERICA PAC; GROUP AMERICA, LLC; ELON MUSK</b>	:	
	:	
Defendants.	:	
	:	
	:	

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**ORDER**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_ , 2025, it is hereby **ORDERED** and  
**DECREED** that William Andrew Taylor, Esquire, is admitted *pro hac vice* to the  
United States District Court for the Eastern District of Pennsylvania, in the above-  
captioned matter only.

**BY THE COURT:**

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Beetlestone, J.

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

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**JOHN DOE**

Plaintiff,	:	
v.	:	No. 2:25-cv-01691-WB
<b>AMERICA PAC; GROUP AMERICA, LLC; ELON MUSK</b>		
Defendants.	:	
:		

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**MOVANT'S STATEMENT OF WILLIAM ANDREW TAYLOR (ANDY  
TAYLOR) IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE**

I, Willaim Andrew Taylor (Andy Taylor), the undersigned, am an attorney who is not currently admitted to either the bar of this court or the bar of the Supreme Court of Pennsylvania, and I hereby apply for admission to practice in this court pursuant to Local Rule of Civil Procedure 83.5.2(b) to represent Defendants America PAC, Group America, LLC, and Elon Musk. My sponsoring attorney will submit the \$75.00 payment using their PACER account at the time of filing this motion.

*A. I state that I am currently admitted to practice in the following state jurisdiction(s):*

State where admitted: Texas  
Admission Date: 1987  
Attorney Identification Number: 19727600

*B. I state that I am currently admitted to practice in the following federal jurisdiction(s):*

N/A

*C. I state that I am at present a member of the aforesaid bar(s) in good standing, and that I will demean myself as an attorney of this court uprightly and according to law, and that I will support and defend the Constitution of the United States.*

I, Willaim Andrew Taylor (Andy Taylor), of the law firm The Gober Group, PLLC at P.O. Box 341016, Austin, TX 78734, am seeking to enter my appearance for Defendants America PAC, Group America, LLC, and Elon Musk.

I declare under penalty of perjury that the foregoing is true and correct.

Date: April 30, 2025

/s/Andy Taylor  
Willaim Andrew Taylor, TX #19727600  
The Gober Group, PLLC  
P.O. Box 341016  
Austin, TX, 78734  
Telephone : (512) 354-1783  
ataylor@vantage.network

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

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JOHN DOE	:	
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Plaintiff,	:	
v.	:	No. 2:25-cv-01691-WB
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AMERICA PAC; GROUP AMERICA, LLC; ELON MUSK	:	
	:	
Defendants.	:	
	:	
	:	

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**MATTHEW H. HAVERSTICK'S MOTION FOR *PRO HAC VICE* ADMISSION  
OF WILLIAM ANDREW TAYLOR**

Matthew H. Haverstick, undersigned counsel for Defendants America PAC, Group America, LLC, and Elon Musk, hereby moves that William Andrew Taylor be admitted to appear and practice in this Court in the above-captioned matter as counsel *pro hac vice* for Defendants America PAC, Group America, LLC, and Elon Musk pursuant to Local Rule of Civil Procedure 83.5.2(b) and the Honorable Wendy Beetlestone's Policies and Procedures, Section V, and in support thereof I aver as follows:

1. I am admitted practice and am in good standing before this Court.
2. I have entered my appearance in the above-captioned matter as is reflected on the docket.
3. Mr. Taylor frequently represents the Defendants, and the Defendants want him to represent them in the above-captioned matter.

4. On April 29, 2025, undersigned contacted Plaintiff's counsel requesting his concurrence in this Motion. As of the filing of this Motion, Plaintiff's counsel has concurred.

5. The undersigned member of the bar of the United States District Court for the Eastern District of Pennsylvania hereby moves for the admission of William Andrew Taylor to practice in said court pursuant to Local Rule of Civil Procedure 83.5.2(b), and certify that I know (or after reasonable inquiry believe) that the applicant is a member in good standing of the above-referenced state and federal court(s) and that the applicant's private and personal character is good.

WHEREFORE, I respectfully request that this Court grant this Motion and enter the attached Order granting William Andrew Taylor admission *pro hac vice* for the above captioned matter.

Date: April 30, 2025

/s/ Matthew H. Haverstick  
 Matthew H. Haverstick (No. 85072)  
 KLEINBARD LLC  
 Three Logan Square, 5<sup>th</sup> Floor  
 1717 Arch Street  
 Philadelphia, PA 19103  
 Phone: (215) 568-2000  
 Fax: (215) 568-0140  
 Eml: mhaverstick@kleinbard.com

*Counsel for Defendants America PAC, Group America, LLC, and Elon Musk*

**CERTIFICATE OF SERVICE**

I hereby certify that on this date, a true and correct copy of the Motion for Admission *Pro Hac Vice* of William Andrew Taylor (Andy Taylor), Esquire was filed electronically, whereby notice of this filing is being electronically sent to all registered parties' counsel by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

By: /s/ Matthew H. Haverstick  
Matthew H. Haverstick, Esquire

Dated: April 30, 2025